

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**Case No. 8:03-CR-77-T-30TBM**

**HATEM NAJI FARIZ**  
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**MOTION TO EXCEED PAGE LIMIT**

Defendant, Hatem Naji Fariz, by and through undersigned counsel, and pursuant to Local Rule 3.01(c), respectfully requests that this Honorable Court allow Mr. Fariz to file motions to suppress in excess of twenty pages. As grounds in support, Mr. Fariz states:

1. Mr. Fariz' motions to suppress are presently due on November 22, 2004.
2. Local Rule 3.01(c) limits briefs and legal memoranda to twenty pages.
3. Mr. Fariz is raising a number of constitutional and legal arguments with regard to the suppression issues in this case. Mr. Fariz' arguments addressing the wiretaps administered pursuant to the Foreign Intelligence Surveillance Act are particularly complicated. While counsel have endeavored to avoid unnecessary length and repetition, the number and complexity of the issues has required additional pages.
4. Counsel have prepared separate motions addressing the searches, seizures and wiretaps.
5. Mr. Fariz therefore would ask permission to file motions that cumulatively exceed the twenty-page limit.

WHEREFORE, Defendant Hatem Naji Fariz respectfully requests permission to file motions in excess of twenty pages.

Respectfully submitted,

R. FLETCHER PEACOCK  
FEDERAL PUBLIC DEFENDER

/s/ M. Allison Guagliardo  
M. Allison Guagliardo  
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Attorney for Defendant Fariz

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 22nd day of November, 2004, a true and correct copy of the foregoing has been furnished by CM/ECF, to Walter Furr, Assistant United States Attorney; Terry Zitek, Assistant United States Attorney; Cherie L. Krigsman, Trial Attorney, U.S. Department of Justice; William Moffitt and Linda Moreno, counsel for Sami Amin Al-Arian; Bruce Howie, counsel for Ghassan Ballut; and to Stephen N. Bernstein, counsel for Sameeh Hammoudeh.

/s/ M. Allison Guagliardo  
M. Allison Guagliardo  
Assistant Federal Public Defender